

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL
PROTECTION BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC), et
al.,

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

**Declaration of Terrence M.
Connors, Esq.**

Case No. 24-CV-40-EAW-MJR

Terrence M. Connors, Esq., declares under penalty of perjury under the laws of the United States pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am an attorney at law admitted to practice my profession in the State of New York and the United States District Court for the Western District of New York and a partner in Connors LLP, counsel for Intervenor Clear Creek Legal, LLC; Credit Advocates Law Firm, LLC; Greenstone Legal Group; Bradon Ellis Law Firm LLC; Hailstone Legal Group; Hallock and Associates; Harbor Legal Group; Anchor Law Firm, PLLC; Bedrock Legal Group; Boulder Legal Group; Canyon Legal Group, LLC; Great Lakes Law Firm; Heartland Legal Group; Level One Law; Meadowbrook Legal Group; Monarch Legal Group; Newport Legal Group, LLC; Northstar Legal Group; Option 1 Legal; Pioneer Law Firm P.C.; Rockwell Legal

Group; Spring Legal Group; Royal Legal Group; Slate Legal Group; Stonepoint Legal Group; The Law Firm of Derek Williams, LLC; Whitstone Legal Group; Wyolaw, LLC; Chinn Legal Group, LLC; Leigh Legal Group, PLLC; Hallock & Associates LLC; Gustafson Consumer Law Group, LLC; Michel Law, LLC; The Law Office of Melissa Michel LLC; and Moore Legal Group, LLC (collectively, “Law Firms”),

2. I submit this declaration in support of the Law Firms’ motion for an Order of this Court: (1) directing the Receiver to instruct Global Client Solutions to resume fee payments to Hailstone and Royal; and (2) directing the Receiver to increase staffing levels and provide the Law Firms with access to certain services, personnel, systems, and information as more fully described in the accompanying memorandum of law.

3. Attached hereto as **Exhibit A** is a letter dated March 11, 2024, in which the Law Firms advised the Receiver that they continued to have concerns over the Receiver’s refusal to provide adequate staffing levels, access to information and systems, and flow of fee payments for the contingent fee firms Royal and Hailstone.

4. Attached hereto as **Exhibit B** is a March 13, 2024 response from the Receiver’s counsel indicating that a response might be forthcoming by that Friday. To date, the Receiver has not responded.

WHEREFORE, the undersigned respectfully requests that this Court order the Receiver to instruct Global Client Solutions to resume fee payments to

Hailstone and Royal and to increase staffing levels and provide the Law Firms with access to certain services, personnel, systems, and information, together with such other and further relief as this Court deems just and proper.

Dated: Buffalo, New York
March 20, 2024

/s/ Terrence M. Connors
Terrence M. Connors